

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

| | | |
|----------------------------|---|-----------------------------|
| Sherrie J. Libecco, and |) | Bankruptcy No. 16-22460-JAD |
| Jeffery J. Libecco, |) | |
| |) | |
| <u>Debtors.</u> |) | Chapter 13 |
| |) | |
| Franklin American Mortgage |) | |
| Company. |) | |
| |) | |
| Movant, |) | Document No. |
| v. |) | |
| |) | Related to Document No. |
| Sherrie J. Libecco, and |) | |
| Jeffery J. Libecco, |) | |
| |) | |
| Respondents. |) | |

DEBTORS' DECLARATION OF SUFFICIENT PLAN FUNDING

Pursuant to the Order of Court entered on November 30, 2016, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtor that the existing payment is sufficient to fund the plan even with the proposed payment changes for January 1, 2017.

The new post-petition monthly payment payable to Movant is \$1,555.26, effective January 1, 2017 per the notice dated December 2, 2016. Debtor's Chapter 13 Plan provides for monthly Plan payments of \$1,563.00 and is therefore sufficient for the payment change.

Dated: December 23, 2016

/s/Brian C. Thompson, Esquire
Brian C. Thompson
PA ID: 91197
Thompson Law Group, P.C.
125 Warrendale-Bayne Rd., Suite 200
Warrendale, PA 15086
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com